

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
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UNITED STATES OF AMERICA,

PLAINTIFF(S)

CASE NO. 4:18-CR-01369

V.

JONATHAN LEE RICHES,

DEFENDANT

**MOTION TO MODIFY STANDARD CONDITION OF PROBATION TO TRAVEL
OUTSIDE OF THE DISTRICT & MOTION FOR COUNSEL**

Comes Now, the Plaintiff, Jonathan Lee Riches, in Pro - Se, Moves to modify a standard condition of my probation which commenced March 29, 2019 & Seeks Counsel to handle this motion.

I am asking for the ability to travel freely within the United States with a minimum of 48 hours advanced notice to my USPO

Please allow me to further elaborate on my request.

- 1) I reside alone in the State of Florida, in a home owned by my elderly parents that I rent from them. I have no other family that live in the State of Florida.
- 2) My elderly parents reside in Chester County Pennsylvania. Living in the same home they resided at for almost 40 years. I also lived in that same home for all my life up to 2018, where I now live in Florida. Most of my extended family live in Pennsylvania.
- 3) My elderly parents are both over 65 years old, and both are retired. Both my Parents have health issues and physical Limitations. My mother is a breast cancer survivor requiring daily therapy for her incurable lymphedema condition, which greatly reduces her overall mobility.
- 4) My elderly parents are taking steps to sell their home in Pennsylvania and move to Florida within the next 12 to 18 months.

5) My elderly parents home in Pennsylvania sits on over an acre of wooded land, and is in significant need of repairs and remodeling prior to sale.

6) I have been needed to assist my elderly parents in Pennsylvania twice within the past 6 weeks. My Federal Probation Officer on this case authorized my permission to travel to Pennsylvania. No problems or incidents occurred during those travels.

7) I anticipate additional more frequent visits to Pennsylvania to assist my elderly parents, particularly in light of their impending move.

8) I am my elderly parents eldest child and only son. My elderly parents rely on me to accomplish tasks they find to be overwhelming due to their age and physical limitations.

9) A continued high level of family contact and support benefits me emotionally as I continue to take positive steps in my life.


My USPO has been responsive thus far in regards to my travel requests, and this request is in no way a reflection of dissatisfaction with the Probation Officer. This modification to my probation terms will provide a more efficient process for both parties, while ensuring my whereabouts will always be communicated and known by my USPO.

I am a non violent offender and most definitely not a flight risk. As a case in point, I traveled to Arizona without incident during the time period of September, 2018 when I was arraigned and released on my own recognizance on this case, and returned back to Arizona for my sentencing March, 2019. Further, while I was on pre-trial release on this case I traveled to Pennsylvania to spend thanksgiving and Christmas with my Elderly Parents without incident.

I am also a middle age man. I am 42 years old.

The Courts approval of my requested probation term modification will allow me the ability to more easily assist my aged parents while maintaining positive healthy relationships with them. Where, Plaintiff respectfully prays this honorable court with grant his motion for relief.

Respectfully,



8.20.19

Jonathan Lee Riches
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Tarpon Springs, FL 34688